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Of Attorneys for Plaintiffs Soothing Touch, LLC and Sat Kartar S. Bird

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORLAND DIVISION

**SOOTHING TOUCH, LLC**, a New Mexico  
Limited Liability Company; and **SAT**  
**KARTAR S. BIRD**, a New Mexico Resident,

Plaintiffs,

v.

**GOLDEN TEMPLE OF OREGON, LLC**,  
an Oregon Limited Liability Company, and  
**KARAM SINGH KHALSA**, an Oregon  
Resident,

Defendants.

**Civil No. 3:10-cv-421-BR**

**RESPONSE TO DEFENDANTS'  
AMENDED ANSWER,  
AFFIRMATIVE DEFENSES AND  
COUNTERCLAIMS**  
By Plaintiffs

Plaintiffs Soothing Touch, LLC and Sat Kartar S. Bird ("Plaintiffs") responds to defendants Golden Temple of Oregon, LLC and Karam Singh Khalsa's ("Defendants") Amended Answer, Affirmative Defenses and Counterclaims as follows:

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1.

Plaintiffs deny the allegations contained in paragraphs 21 through 26.

2.

Plaintiffs deny the allegations contained in paragraphs 27 through 35.

3.

In answer to the allegations contained in paragraph 30, Plaintiffs reallege and incorporate its responses to paragraphs 27 through 29.

4.

In answer to the allegations contained in paragraph 33, Plaintiffs reallege and incorporate its responses to Defendants' paragraphs 27 through 32.

5.

In answer to the allegations contained in paragraph 36, Plaintiffs reallege and incorporate its responses to Defendants' paragraphs 33 through 35.

6.

Plaintiffs deny the allegations contained in paragraphs 38 through 41.

7.

In answer to the allegations contained in paragraph 42, Plaintiffs reallege and incorporate its responses to Defendants' paragraphs 27 through 32.

8.

Plaintiffs admit the allegations contained in paragraphs 43 through 45.

9.

Plaintiffs deny the allegations contained in paragraphs 46 through 48.

10.

Plaintiffs admit the allegations contained in paragraph 49.

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11.

Plaintiffs deny the allegations contained in paragraph 50.

DATED: July 30, 2010.

CABLE HUSTON BENEDICT HAAGENSEN &  
LLOYD LLP

By: s/ Carla Scott  
Carla Scott, OSB No. 054725  
Of Attorneys for Plaintiffs Soothing Touch LLC  
and Sat Kartar S. Bird

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **PLAINTIFFS' RESPONSE TO DEFENDANTS' AMENDED ANSWER, AFFIRMATIVE DEFENSES, AND COUNTERCLAIMS** was served on:

Vicki Smith  
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Of Attorneys for Defendants

by the following indicated methods or methods:

- ELECTRONIC MAIL – CM/ECF** notice of electronic filing.
- by **MAILING** a full, true and correct copy thereof in a sealed, postage-paid envelope, addressed as shown above, and deposited with the U.S. Postal Service at Portland, Oregon, on the date set forth below.
- by causing a full, true and correct copy thereof to be **HAND-DELIVERED** to the party, at the address listed above on the date set forth below.
- by causing a full, true and correct copy thereof by **ELECTRONIC MEANS** to the party, at the party's last known email address listed above on the date set forth below.
- by sending a full, true and correct copy thereof via **OVERNIGHT COURIER** in a sealed, prepaid envelope, addressed to the Party as shown above, at the last known address of the attorney, on the date set forth below.
- by **FAXING** a full, true and correct copy thereof to the party, at the fax number shown above, which is the last-known fax number for the party's office, on the date set forth below.

DATED this 30<sup>th</sup> day of July 2010.

s/ Rhonda Roth

Rhonda Roth, Litigation Assistant to  
 Carla Scott, OSB No. 054725  
 Of Attorneys for Plaintiffs